KURT F. JOHNSON 13177-081 UNITED STATES PENITENTIARY P.O. BOX 1000 MARION, IL 62959

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Case No.: 18-cr-40043-JPG

Plaintiff,

NOTICE OF EXPERT WITNESS

٧.

KURT F. JOHNSON,

Defendant.

The defense wishes to have Judge Joan E. Donoghue also considered an expert witness as to matter of International Law and Treaties. Her qualifications are beyond repute with this court and based upon comments fo Quinley on 9-14-18 in court it appears a stipulation to these qualifications is highly likely. This request is made in accordance with FRCP 16(g) and Rules of Evidence 702, 703, and 705. The direct examination may enter into questions of expertise and therefore this designation should be noticed in advance. We all know it is highly unlikely that Donoghue will be testifying for if she provides the judgment the indictment will become moot. If she does not a motion to quash will most likely be granted. Her involvement is direct and not circumstantial. If the trial goes circumstantial she'il become irrelevant as a defense witness. Though this request is made for a rare set of event it must be made in the interest of caution and fair play.

September 17, 2018

Respectfully submitted,

Executor Kurt-f.-Johnson for KURT F. JOHNSON Defendant.

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P.O. BOX 1000 MARION, IL 62959 SAINT LOUIS MO 630

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⇔13177-081⇔ U S Dist Court 301 W MAIN ST Benton, IL 62812 **United States** 

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